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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

19 RECORDINGS LIMITED)	
)	Case No. 14-CV-I056 (RA)(GWG)
Plaintiff,)	
v.)	PLAINTIFF 19 RECORDINGS LIMITED
)	MOTION TO AMEND
SONY MUSIC ENTERTAINMENT,)	
)	<u>DEMAND FOR JURY TRIAL</u>
Defendant.)	
)	
)	
)	
)	
)	

Plaintiff 19 Recordings Limited (“19”), by and through its counsel, hereby submits its Motion to Amend its First Amended Complaint to add a claim that Defendant Sony Music Entertainment (“Sony”) breached its duty of good faith and fair dealing by agreeing with Spotify (a Company in which Sony owns an interest) to be paid a below industry standard royalty rate for streaming income in exchange for a share of advertising and other forms of revenue, which Sony does not have to share with 19, its artists, and every other artist in Sony’s roster. This self dealing has no relation to the value that Sony’s catalog offers to Spotify, which is entirely attributable to Spotify’s right to exploit master recordings owned or controlled by Sony, and this payment structure was created in bad faith. These actions, as explained herein, rob 19 and its artists (indeed all artists), to their rightful share of royalties under the Recording Agreements, constitute a violation of Sony’s duty of good faith and fair dealing, and must be cured.

Due to the importance of the instant Motion, 19 respectfully requests this Court grant oral argument on the Motion.

Dated: June 15, 2015

Respectfully submitted,

By: /s/Richard S. Busch

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June 2015, the preceding document was sent by Electronic Mail to:

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/s/Richard S. Busch